REMARKS

In response to the Office Action dated January 4, 2007, claims 1 and 16 have been amended. Claims 1-20 are now active in this application. No new matter has been added.

Claims 1, 9-14, 16, 19, and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Poland et al. (U.S. 6,681,195) in view of Matsushita (JP 07-105481).

Claims 2-6, 15, 17, and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Poland et al. (U.S. 6,681,195) in view of Matsushita (JP 07-105481), and further in view of Jukuda (JP 09-202180).

Claims 7 and 8 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Poland et al. (U.S. 6,681,195) in view of Matsushita (JP 07-105481), and further in view of Oka et al. (U.S. 6,838,994).

Independent claim 1 recites, in pertinent part, "an image forming section for forming a two dimensional image of the front scene on a image plane, wherein the image forming section includes a distortion lens having a characteristic of forming an image, with a height of the image being larger in a central area and smaller in a peripheral area so as to allow the central area of the image to have a high resolution." Independent claim 16 recites a similar limitation.

In order to establish a *prima facie* obviousness under 35 U.S.C. § 103(a), all the claim limitations must be taught or suggested by the prior art. In re Rokya, 490 F. 2d 981, 180 USPQ 580 (CCPA 1974). Further, "rejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." *In re Kahn*, 441 F. 3d 977, 988 (CA Fed. 2006). At a minimum, the cited prior art does not disclose (expressly or inherently) the above recited limitations.

Poland, at FIG. 1, element 142, merely discloses a lens system which, in a preferred embodiment, "provides a full field-of-view of 1.5 degrees and is focused at 80 meters to obtain sharp images from 50 to 120 meters," according to column 7, lines 11-13.

Matsushita, at FIG. 1, merely discloses "the zoom lens 13," according to the Abstract.

Thus, Applicant respectfully submits that independent claims 1 and 16 are patentable over Poland and Matsushita.

Further, Applicant respectfully submits that the other cited art (Fukuda and Oka) does not remedy the deficiencies of Poland and Matsushita.

For example, Fukuda merely discloses a "fisheye camera 2" at Abstract, and does not teach or suggest the recited limitation of claim 1.

Additionally, Oka merely discloses a lens 12 at FIG. 1, and does not teach or suggest the above recited limitation of claim 1.

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as independent claims 1 and 16 are patentable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also patentable.

Thus, it is respectfully submitted that dependent claims 2-15, and 17-20 are also allowable, for at least the same reasons as independent claims 1 and 16.

Accordingly, it is urged that the application, as now amended, is in condition for allowance, an indication of which is respectfully solicited. If there are any outstanding issues

that might be resolved by an interview or an Examiner's amendment, Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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